

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-  
Form Complaint and:

Floyd Little, et al. v. National Football  
League, et al. (Plaintiffs Rubin Carter  
and Karen Carter ONLY)

Court File No. 2:12-cv-02219-AB

**MOTION FOR LEAVE TO  
WITHDRAW AS COUNSEL  
FOR PLAINTIFFS RUBIN CARTER  
AND KAREN CARTER**

J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Rubin Carter and Karen Carter only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Floyd Little, et al. v. National Football League, et al.*, No. 2:12-cv-02219-AB, in the Eastern District of Pennsylvania on April 24, 2012, for the benefit of several retired National Football League players, including Rubin Carter and Karen Carter.

2. Plaintiffs' counsel filed a short form complaint for Rubin Carter and Karen Carter on July 12, 2012.

3. Despite the efforts of the undersigned on Plaintiffs behalf, the NFL Concussion Settlement Claims Administrator informed Zimmerman Reed LLP that Plaintiffs retained separate counsel to represent them in this case.

4. Specifically, on May 27, 2022, the Claims Administrator issued an NFL Representation Notification (“Notice”) to Zimmerman Reed LLP, stating that Plaintiff informed the Claims Administrator that he was represented by a different lawyer, and listing Pro Athlete Law Firm P.A. as the “New Lawyer Requested by Settlement Class Member”.

5. The Notice provides “seven days to communicate with the Settlement Class Member and come to a resolution” before the Claims Administrator would “update the Class Member’s representation in [its] database to the new lawyer above.” Zimmerman Reed LLP has not discussed further representation with Plaintiff. More than seven days have passed from the Notice date.

6. Under the circumstances, it is apparent that Rubin Carter and Karen Carter have hired separate counsel to represent them, that those counsel have been identified to the Claims Administrator, and that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs’ counsel respectfully requests this Court for leave to withdraw as counsel for Rubin Carter and Karen Carter only in Court File No. 2:12-cv-02219-AB.

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Dated: July 29, 2022

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

J. Gordon Rudd, Jr. (#222082)

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